REMARKS

Claims 1-8, 16, and 17 were presented for examination and were rejected in the Final Office Action dated October 27, 2003. Claim 2 is hereby canceled. Claim 18 is hereby added. Thus, Claims 1, 3-8, and 16-18 remain pending. Reconsideration and allowance are respectfully requested.

In the Final Office Action dated October 27, 2003, the Examiner rejected claims 1 and 16 under 35 U.S.C. § 102(e) as being anticipated by Ahearn et al. (U.S. Patent No. 5,926,463), and rejected claims 2-8 and 17 under 35 U.S.C. § 103(a) as being unpatentable over Ahearn et al. in view of Andersson et al. (U.S. Patent No. 6,163,544).

In view of the foregoing amendments and the following remarks, Applicants respectfully traverse the Examiner's rejections of the claims under 35 U.S.C. §§ 102(e) and 103(a).

In order to properly anticipate Applicants' claimed invention under 35 U.S.C. § 102, each and every element of the claim in issue must be found, either expressly described or under principles of inherency, in a single prior art reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in...the claim." See M.P.E.P. § 2131 (8th Ed., Aug. 2001), quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q. 2d 1913, 1920 (Fed. Cir. 1989). Finally, "[t]he elements must be arranged as required by the claim." § 2131 (8th ed., 2001), p. 2100-69.

Applicants respectfully traverse the Examiner's rejection of claims 1 and 16 under 35 U.S.C. § 102(e) as being anticipated by Ahearn et al., because each and every element of the claims in issue are not found in a single reference. For example, claim 1, as amended herein, provides for a method for customer centric network

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management comprising the steps, performed by a processor, of: receiving identification data corresponding to a customer in a network; accessing a generic information model database for one or more customer records corresponding to the customer identification data; receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; and providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network components supporting a specific service for the customer.

Applicants respectfully submit that Ahearn et al. does not disclose or suggest at least the combination of steps in claim 1. For example, Ahearn et al. does not disclose or suggest at least: accessing a generic information model database for one or more customer records corresponding to the customer identification data; receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; and providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network components supporting a specific service for the customer.

Ahearn et al. discloses a system for viewing a configuration of a computer network (abstract). Devices in the network may be graphically displayed according to physical connectivity and status (abstract). A network supervisor may use the system to

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create an IP view of a network that shows all of the devices and links between a particular workstation and a particular server, for example (col. 6, lines 23-33; FIG. 1).

In contrast, systems and methods consistent with the present invention as recited for example in claim 1, use customer records in order to provide actual circuit path information that is used to create a graphical representation of heterogeneous network components supporting a specific service for a customer. For example, methods consistent with the present invention access a generic information model database for one or more customer records corresponding to received customer identification data. Methods consistent with the present invention also receive selection information identifying a selected one of the one or more customer records. Moreover, methods consistent with the present invention provide actual circuit path information corresponding to a customer service based on the selected customer record.

Ahearn et al. does not utilize customer records in such a manner. Ahearn et al. discloses that a network supervisor may view different IP views but does not disclose that actual circuit path information corresponding to a customer service is provided based on a selected customer record. Additionally, Ahearn et al. does not disclose accessing any type of database, let alone a generic information model database, for one or more customer records that correspond to received customer identification data. Moreover, Ahearn et al. is silent as to whether its system receives selection information identifying a selected customer record from one or more customer records.

Accordingly, Ahearn et al. does not disclose, teach, or suggest at least: accessing a generic information model database for one or more customer records corresponding to the customer identification data; receiving selection information

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identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; and providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical repres ertation of heterogeneous network components supporting a specific service for the customer.

For at least the foregoing reasons, Applicants submit that claim 1 is not anticipated by <u>Ahearn et al.</u> Because claim 16 is an independent claim with limitations similar to those of claim 1, Applicants further submit that claim 1 is not anticipated by <u>Ahearn et al.</u> for at least the reasons given with respect to claim 1.

With regard to the Examiner's rejection of claims 2-8 and 17 under 35 U.S.C. § 103(a) as being unpatentable over <u>Ahearn et al.</u> in view of <u>Andersson et al.</u>, Applicants respectfully traverse that rejection, because a *prima facie* case of obviousness has not been made by the Examiner. To establish a prima facie case of obviousness, three basic criteria must be met. First, the prior art reference as modified must teach or suggest all the claim elements. (See M.P.E.P. § 2143.03 (8th ed. 2001)). Second, there must be some suggestion or motivation, either in the reference or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine the reference teachings. (See M.P.E.P. § 2143 (8th ed. 2001)). Third, a reasonable expectation of success must exist. Moreover, each of these requirement must "be found in the prior art, and not be based on applicant's disclosure." (M.P.E.P. § 2143.03 (8th ed. 2001)).

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Claim 3, as amended herein, provides for a method for customer centric network management in a network comprising the steps, performed by a processor, of: populating a permanent database with network component information, the permanent database storing the network component information according to a generic information model; receiving customer identification data corresponding to a customer in the network; accessing the permanent database for one or more customer records corresponding to the customer identification data, each customer record having network component information associated with it; receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network components supporting a specific service for the customer.

Applicants respectfully submit that <u>Ahearn et al.</u> in view of <u>Andersson et al.</u> do not disclose or suggest at least this claimed combination of steps. As explained above with reference to claims 1 and 16, <u>Ahearn et al.</u> does not disclose at least: accessing a generic information model database for one or more customer records corresponding to the customer identification data; receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; and providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network components supporting a specific service for the customer.

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For similar reasons, Applicants respectfully submit that <u>Ahearn et al.</u> does not disclose or suggest at least: accessing the permanent database for one or more customer records corresponding to the customer identification data, each customer record having network component information associated with it; receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; and providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network components supporting a specific service for the customer. More particularly, <u>Ahearn et al.</u> does not disclose these features because <u>Ahearn et al.</u> does not disclose using customer records in the various manners presently recited, for example, in claim 3.

<u>Andersson et al.</u> is not sufficient to overcome the aforementioned deficiencies of <u>Ahearn et al.</u> <u>Andersson et al.</u> is used by the Examiner to allege a teaching of storing information according to a generic information model. <u>Andersson et al.</u>, however, makes no mention of using customer records as presently claimed. For example, <u>Andersson et al.</u> does not provide for "accessing the permanent database for one or more customer records corresponding to the customer identification data, each customer record having network component information associated with it." <u>Andersson et al.</u> also does not provide for "receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer." Moreover, <u>Andersson et al.</u> does not disclose "providing actual circuit path information corresponding to a customer service based on the

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selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network components supporting a specific service for the customer."

Accordingly, <u>Ahearn et al.</u> either alone or in combination with <u>Andersson et al.</u>, does not disclose, teach, or suggest at least: accessing the permanent database for one or more customer records corresponding to the customer identification data, each customer record having network component information associated with it; receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; and providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network components supporting a specific service for the customer, as recited in claim 3.

For at least the foregoing reasons, Applicants submit that claim 3 is patentable over <u>Ahearn et al.</u> in view of <u>Andersson et al.</u> Because claim 17 is an independent claim with recitations similar to those of claim 3, Applicants further submit that claim 17 is patentable over <u>Ahearn et al.</u> in view of <u>Andersson et al.</u> for at least the reasons given with respect to claim 3. Additionally, Applicants submit that claims 1 and 16 are patentable over <u>Ahearn et al.</u> in view of <u>Andersson et al.</u> for reasons similar to those provided for claims 3 and 17 above.

The dependent claims 4-8 are allowable not only for the reasons stated above with regard to their respective allowable base claims, but also for their own additional features that distinguish them from <u>Ahearn et al.</u> in view of <u>Andersson et al.</u>

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New claim 18 claims subject matter of the present invention in a different aspect from that of the other pending claims. Applicants believe that claim 18 is allowable over the cited references for the same or similar reasons to those presented hereinabove. Since each of the claims is allowable, Applicants respectfully request the timely allowance of this application.

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing the claims in condition for allowance. Applicants submit that the proposed amendments of the claims do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

If an extension of time under 37 C.F.R. § 1.136 is required to obtain entry of this Amendment, such extension is requested. If there are any other fees due under 37 C.F.R. §§ 1.16 or 1.17 which are not enclosed herewith, including any fees required for an extension of time under 37 C.F.R. § 1.136, please charge such fees to our Deposit Account No. 07-2347.

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Respectfully submitted,

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